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**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors

- ☐ Affects PG& E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

**All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**DECLARATION OF KODY KLEBER IN
SUPPORT OF MOTION OF THE
OFFICIAL COMMITTEE OF TORT
CLAIMANTS FOR ENTRY OF AN
ORDER AUTHORIZING THE FILING
OF A REPLY IN SUPPORT OF
MOTION OF THE OFFICIAL
COMMITTEE OF TORT CLAIMANTS
TO COMPEL PRODUCTION OF
THIRD-PARTY CONTRACTOR
DOCUMENTS**

1 KODY D. L. KLEBER, under penalty of perjury, declares:

2 1. I am a partner at Baker & Hostetler LLP, counsel to the Official Committee of Tort
3 Claimants (the “TCC”) of PG&E Corporation and Pacific Gas and Electric Company (the
4 “Debtors”) in these chapter 11 cases.

5 2. I submit this Declaration in support of the Motion of the Official Committee of Tort
6 Claimants for Entry of an Order Authorizing the Filing Under Seal of a Reply in Support of Motion
7 of the Official Committee of Tort Claimants to Compel Production of Third-Party Contractor
8 Documents (“Sealing Motion”).

9 3. The TCC wishes to file a Reply in Support of Motion of the Official Committee of
10 Tort Claimants to Compel Production of Third-Party Contractor Documents (the “Reply”).
11 Throughout the Reply, the TCC cites and attaches documents designated as “Contractor
12 Confidential” under the Confidentiality and Protective Order, entered by this Court on July 1, 2019
13 [Docket No. 2807-1]. The confidential documents are necessary in demonstrating to the Court
14 specific deficiencies in Debtors’ productions.

15 4. On Tuesday, August 20, 2019, counsel for the TCC asked counsel for the Debtors
16 to remove confidentiality designations for the confidentially-designated documents referenced and
17 attached in the Reply. As of the time of the filing of the Reply and the Sealing Motion, the TCC
18 has not reached an agreement with the Debtors to waive confidentiality designations.

19 *Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States*
20 *of America that the foregoing is true and correct to the best of my knowledge and belief.*

21
22 Executed on August 20, 2019

/s/ Kody D. L. Kleber
By: Kody D. L. Kleber
Admitted Pro Hac Vice